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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: \_\_\_\_\_

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2013 Grand Jury

11	UNITED STATES OF AMERICA,	)	CR No. 13	<b>CR13-0832</b>
12	Plaintiff,	)		
13	v.	)	<u>I N D I C T M E N T</u>	
14	JOHN METTERS,	)	[18 U.S.C. § 287: Making False	
15	Defendant.	)	and Fraudulent Claims; 18 U.S.C.	
16		)	§ 641: Theft of Government	
17		)	Property; 18 U.S.C. § 1028A:	
18		)	Aggravated Identity Theft; 18	
19		)	U.S.C. § 2(b): Causing an Act to	
20		)	Be Done]	

The Grand Jury charges:

COUNTS ONE through TWENTY-ONE

[18 U.S.C. §§ 287, 2(b)]

On or about the dates set forth below, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS knowingly made and presented, and caused to be made and presented, to the Internal Revenue Service, a department and agency of the United States, the following false, fictitious, and fraudulent claims against the United States, that is, the below-listed federal income tax returns falsely claiming tax refunds, knowing that each claim

1 was false, fictitious, and fraudulent in that the named filers  
 2 did not have the earned income, gross distributions, and federal  
 3 income tax withholdings reported and were not entitled to the  
 4 tax refunds claimed on the returns:

<u>COUNT</u>	<u>DATE</u>	<u>FALSE CLAIM</u>
ONE	2/06/09	A 2008 federal income tax return in the name of T.W. Sr., claiming a refund of \$20,630
TWO	2/11/09	A 2008 federal income tax return in the name of V.C., claiming a refund of \$8,965
THREE	2/18/09	A 2008 federal income tax return in the name of D.C., claiming a refund of \$16,211
FOUR	2/19/09	A 2008 federal income tax return in the name of M.B., claiming a refund of \$10,007
FIVE	2/19/09	A 2008 federal income tax return in the name of B.M., claiming a refund of \$9,310
SIX	2/19/09	A 2008 federal income tax return in the name of T.W. Jr., claiming a refund of \$7,149
SEVEN	2/22/09	A 2008 federal income tax return in the name of L.F., claiming a refund of \$12,285
EIGHT	2/22/09	A 2008 federal income tax return in the name of A.B., claiming a refund of \$10,454
NINE	2/27/09	A 2008 federal income tax return in the name of D.A.W., claiming a refund of \$15,890
TEN	3/04/09	A 2008 federal income tax return in the name of T.H., claiming a refund of \$9,362
ELEVEN	3/23/09	A 2008 federal income tax return in the name of S.H., claiming a refund of \$40,036

1	TWELVE	4/15/09	A 2008 federal income tax return in the
2			names of V.L. and G.S., claiming a
3	THIRTEEN	4/16/09	refund of \$18,779
4			
5	FOURTEEN	6/04/09	A 2008 federal income tax return in the
6			names of D.W. and R.W., claiming a
7	FIFTEEN	1/27/10	refund of \$6,638
8			
9	SIXTEEN	2/05/10	A 2007 federal income tax return in the
10			name of S.H., claiming a refund of
11	SEVENTEEN	4/16/10	\$16,374
12			
13	EIGHTEEN	2/07/11	A 2009 federal income tax return in the
14			name of V.C., claiming a refund of
15	NINETEEN	2/08/11	\$9,647
16			
17	TWENTY	2/13/11	A 2009 federal income tax return in the
18			name of M.B., claiming a refund of
19	TWENTY-ONE	2/24/11	\$10,584
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## COUNTS TWENTY-TWO through THIRTY-SEVEN

[18 U.S.C. § 641]

On or about the dates set forth below, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") embezzled, stole, purloined, and knowingly converted to his own use and the use of another money and property of the United States, that is, the below-listed United States Treasury Department tax filer refunds ("Treasury refund"), each having a value greater than \$1,000, to which defendant METTERS knew that neither he nor the below-listed tax filers were entitled:

COUNT	DATE	APPROXIMATE AMOUNT OF TREASURY REFUND
TWENTY-TWO	2/20/09	\$20,190.15 to be paid to tax filer T.W. Sr.
TWENTY-THREE	2/20/09	\$8,825.15 to be paid to tax filer V.C.
TWENTY-FOUR	3/06/09	\$16,071.15 to be paid to tax filer D.C.
TWENTY-FIVE	3/06/09	\$9,567.15 to be paid to tax filer M.B.
TWENTY-SIX	3/06/09	\$9,272.15 to be paid to tax filer B.M.
TWENTY-SEVEN	3/06/09	\$7,009.15 to be paid to tax filer T.W. Jr.
TWENTY-EIGHT	3/06/09	\$11,396.78 to be paid to tax filer L.F.
TWENTY-NINE	3/13/09	\$10,314.15 to be paid to tax filer A.B.
THIRTY	5/01/09	\$18,609.15 to be paid to tax filers V.L. and G.S.
THIRTY-ONE	5/01/09	\$6,468.15 to be paid to tax filers D.W. and R.W.
THIRTY-TWO	5/08/09	\$2,814.80 to be paid to tax filer T.H.
THIRTY-THREE	5/26/09	\$40,036 to be paid to tax filer S.H.
THIRTY-FOUR	6/26/09	\$15,858.48 to be paid to tax filer D.A.W.

1	THIRTY-FIVE	7/21/09	\$16,374 to be paid to tax filer S.H.
2	THIRTY-SIX	2/05/10	\$9,550.15 to be paid to tax filer V.C.
3	THIRTY-SEVEN	5/21/10	\$10,487.98 to be paid to tax filer M.B.

COUNT THIRTY-EIGHT

[18 U.S.C. § 1028A]

On or about February 6, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are T.W. Sr., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Two of this Indictment.

COUNT THIRTY-NINE

[18 U.S.C. § 1028A]

On or about February 11, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are V.C., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Three of this Indictment.

COUNT FORTY

[18 U.S.C. § 1028A]

On or about February 18, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are D.C., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Four of this Indictment.



COUNT FORTY-ONE

[18 U.S.C. § 1028A]

On or about February 19, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are M.B., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Five of this Indictment.

COUNT FORTY-TWO

[18 U.S.C. § 1028A]

On or about February 19, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are B.M., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Six of this Indictment.

COUNT FORTY-THREE

[18 U.S.C. § 1028A]

On or about February 19, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are T.W. Jr., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Seven of this Indictment.

COUNT FORTY-FOUR

[18 U.S.C. § 1028A]

On or about February 22, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are L.F., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Eight of this Indictment.

COUNT FORTY-FIVE

[18 U.S.C. § 1028A]

On or about February 22, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are A.B., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Twenty-Nine of this Indictment.

COUNT FORTY-SIX

[18 U.S.C. § 1028A]

On or about February 27, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are D.A.W., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty-Four of this Indictment.

COUNT FORTY-SEVEN

[18 U.S.C. § 1028A]

On or about March 4, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are T.H., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty-Two of this Indictment.

COUNT FORTY-EIGHT

[18 U.S.C. § 1028A]

On or about March 23, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are S.H., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty-Three of this Indictment.



COUNT FORTY-NINE

[18 U.S.C. § 1028A]

On or about April 15, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, means of identification that defendant METTERS knew belonged to another person, that is, the names and Social Security Account numbers of tax filers whose initials are V.L. and G.S., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty of this Indictment.

COUNT FIFTY

[18 U.S.C. § 1028A]

On or about April 16, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, means of identification that defendant METTERS knew belonged to another person, that is, the names and Social Security Account numbers of tax filers whose initials are D.W. and R.W., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty-One of this Indictment.

COUNT FIFTY-ONE

[18 U.S.C. § 1028A]

On or about June 4, 2009, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are S.H., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty-Five of this Indictment.

COUNT FIFTY-TWO

[18 U.S.C. § 1028A]

On or about January 27, 2010, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are V.C., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty-Six of this Indictment.

COUNT FIFTY-THREE

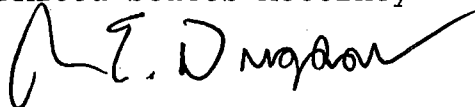
[18 U.S.C. § 1028A]

On or about February 5, 2010, in San Bernardino County, within the Central District of California, and elsewhere, defendant JOHN METTERS ("METTERS") knowingly possessed and used, without lawful authority, a means of identification that defendant METTERS knew belonged to another person, that is, the name and Social Security Account number of a tax filer whose initials are M.B., during and in relation to a felony violation of Title 18, United States Code, Section 641, Theft of Government Property, as charged in Count Thirty-Seven of this Indictment.

A TRUE BILL

15/  
FOREPERSON

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